



U.S. Department of Justice

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September 29, 2017

Honorable Catherine C. Blake
United States District Court for the District of Maryland
101 West Lombard Street
Baltimore, MD 21201

Re: United States of America v. Montana Barronette et al
Criminal No. CCB-16-597

Dear Judge Blake:

The purpose of this letter is to provide the Court with a status report and to request that the Court set a new status report date in 45 days. On December 14, 2016, the grand jury returned a Superseding Indictment, charging five defendants with conspiracy to distribute and possession with intent to distribute heroin. The Superseding Indictment also charges several of the defendants with possession with intent to distribute a controlled substance. On June 29, 2017, the grand jury returned a superseding indictment, charging ten defendants with racketeering conspiracy, four defendants with violent crime in aid of racketeering, and two defendants with possession of a firearm in furtherance of a drug trafficking crime.

To date, one defendant remains a fugitive (Taylor), two of the twelve defendants have pled guilty (Chatman and Woodfolk), and there have been no motions filed. The government recently disclosed a significant amount of discovery, including documents related to the ten homicides referenced in the superseding indictment. The government will continue to disclose materials as they become available.

On August 29, 2017, the Court held a status conference and directed the parties to file a status report in this case on September 29, 2017. In the past thirty days, the government has continued to engage in plea negotiations with several of the defendants and two defendants pled guilty. Additionally, with regard to the four defendants charged with the death eligible offense in Count Two, the government has submitted its recommendation to the Capital Case Section ("CCS") and is awaiting a response. Now that the government has disclosed the homicide materials, the government anticipates being able to engage in plea negotiations with defendants named in the racketeering conspiracy.

Based on the foregoing, the government, without objection from the parties,¹ believes that delaying setting a trial schedule for 45 days will allow the parties to review the discovery, engage in plea negotiations, and provide the CCS time to review our Office's recommendation. As such, the government requests that the Court delay setting a trial schedule for an additional 45 days and set another status report date for November 13, 2017.

Very truly yours,

Rod J. Rosenstein
United States Attorney for the District of Maryland

By: _____/s/
Daniel C. Gardner
Christopher Romano
Assistant United States Attorneys

cc: All counsel (via CM/ECF)

¹ The government provided this status report to all parties, but did not receive a response from all counsel.